



**U.S. Department of Justice**

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September 7, 2022

The Honorable Catherine C. Blake  
United States District Court for the District of Maryland  
Garmatz Federal Courthouse  
101 West Lombard Street  
Baltimore, Maryland 21201

Re: *United States v. Farace et al.*,  
Criminal No. CCB-21-294

Dear Judge Blake:

I write regarding the status of the above-captioned case. The two defendants in this case, Ryan Farace ("R. Farace") and Joseph Farace ("J. Farace"), have each been charged in a one-count indictment with conspiracy to commit money laundering, in violation of 18 U.S.C. § 1956(h). Initial appearances for J. Farace and R. Farace occurred on October 6 and 8, 2021, respectively; in addition, R. Farace had his arraignment on October 8, 2021.

Plea offers were extended by the Government to each defendant on July 26, 2022. A re-arraignment is scheduled before Your Honor for Thursday, September 8, 2022, for defendant R. Farace. The offer to defendant J. Farace remains under consideration. The Speedy Trial Clock is tolled for both defendants through September 8, 2022 (ECF No. 46), and the Government expects to file a Consent Motion to Exclude Time to toll additional time for defendant J. Farace.<sup>1</sup> The Government requests that a further status update be scheduled for October 7, 2022, with the understanding that should the outstanding plea offer be accepted, the relevant parties will promptly reach out to the Court to schedule a hearing.

Respectfully submitted,

/s/

Coreen Mao  
Assistant United States Attorney

cc: David Walsh-Little, Esq. (via ECF)  
Gerry Ruter, Esq. (via ECF)

<sup>1</sup> As of the time of filing this status report, counsel for defendant J. Farace has not yet provided his position on the motion. Prior Speedy Trial Act tolling motions have been consent motions.